

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Connolly Financial	:	Bk. No. 05-33857 TPA
a/k/a Patrick Connolly	:	
a/k/a Patrick J. Connolly	:	Chapter No. 13
a/k/a Patrick John Connolly	:	
Debtor	:	
	:	
TCIF REO2, LLC	:	
	:	
Movant	:	
v.	:	
	:	
Connolly Financial	:	
a/k/a Patrick Connolly	:	
a/k/a Patrick J. Connolly	:	
a/k/a Patrick John Connolly	:	
Respondent	:	
	:	

OBJECTION OF TCIF REO2, LLC TO CONFIRMATION OF THE DEBTOR'S CHAPTER 13 PLAN

Movant, TCIF REO2, LLC (hereinafter referred to as "Movant"), by its attorneys Phelan Hallinan & Schmieg, LLP hereby objects to confirmation of the Debtor's Chapter 13 Plan as follows:

1. Movant is TCIF REO2, LLC.
2. Debtor is Connolly Financial a/k/a Patrick Connolly a/k/a Patrick J. Connolly a/k/a Patrick John Connolly.
3. Movant filed a Proof of Claim in the amount of \$40,849.97 for pre-petition arrears. A copy of the Proof of Claim is attached hereto as Exhibit "A" and made a part hereof.
4. Debtor's Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. Debtor's Plan currently provides for payment to Movant in the amount of \$26,000.00. A copy of the Debtor's Plan is attached hereto as Exhibit "B" and made a part hereof.

WHEREFORE, TCIF REO2, LLC respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

/s/ Andrew L. Spivack, Esquire
Andrew L. Spivack, Esquire
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November 2, 2005